

SSS:JRS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 21, U.S.C., § 963)

FENG JIANG and
CHANG XU,

19-M-574

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

LAMONT FRASER, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

In or about June 2019, within the Eastern District of New York and elsewhere, the defendants FENG JIANG and CHANG XU, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing 3,4-Methylenedioxymethamphetamine (“MDMA”), a Schedule I controlled substance, contrary to Title 21, United States Code, Section 952(a).

(Title 21, United States Code, Section 963)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with HSI and have been since 2016. Through my training, education and experience, I have become familiar with the manner in which illegal narcotics are transported and distributed. I have participated in numerous investigations related to importation of controlled substances.

2. On or about June 8, 2019, Customs and Border Protection ("CBP") officers at the John F. Kennedy International Airport Mail Branch intercepted a parcel being shipped internationally from Germany to the United States. CBP conducted an enforcement examination of the parcel, which was found to contain approximately 8,686 grams of a white-powdery substance.

3. CBP officers conducted a field test of the substance that revealed the presence of MDMA.

4. The parcel was addressed to "Chen," at an address in Queens, New York (the "Queens Address"). The label on the parcel also included a partially legible phone number.

5. On or about June 20, 2019, undercover law enforcement agents made a controlled delivery of the parcel to the Queens Address. The individual who came outside to receive the package ("Individual-1") stated that the package was not his, but that he

¹ Because the purpose of this complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all of the relevant facts and circumstances of which I am aware.

recognized the phone number on the label as the phone number of his tenant, the defendant CHANG XU. Individual-1 then called XU, who came outside of the building.

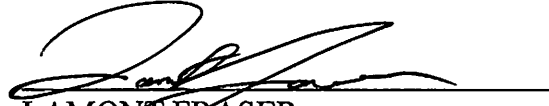
6. The defendant CHANG XU spoke to the undercover agent and said that the package was intended for him, even though his name had been misspelled as “Chen” on the label. XU further stated that the phone number on the label was his phone number.

7. The defendant CHANG XU was then placed under arrest by law enforcement officials and his cell phone was seized incident to arrest.

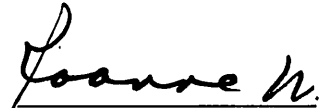
8. With The defendant CHANG XU’s consent, law enforcement officials searched XU’s cell phone and discovered text communications between XU and the defendant FENG JIANG. In these communications, JIANG instructed XU on what to do when he received the parcel, including instructions to arrange for JIANG to pick up the parcel from XU. These communications further indicated that JIANG intended to pay XU \$1,000 for receiving the package.

9. Several hours after the defendant CHANG XU’s arrest, the defendant FENG JIANG came to the Queens Address and was arrested by law enforcement agents. JIANG possessed more than \$3,000, including \$1,000 that was kept separately from the remaining currency.

WHEREFORE, your deponent respectfully requests that the defendants FENG
JIANG and CHANG XU be dealt with according to law.


LAMONT FRASER
Special Agent
U.S. Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
20th day of June, 2019


THE HONORABLE
CHIEF UNITED STATES
EASTERN DISTRICT

S/Mann